

Hon. Sidney H. Stein 500 Pearl Street New York, New York 10007

> Re: United States v. Abdool, et al. 07 Cr.1007 (SHS)

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Dear Judge Stein:

With the consent of the government by Michael Rosensaft we the undersigned write to request a brief adjournment of the trial of the above referenced matter from March 31, 2008, until April 14. 2008.

In short, we need more time to discuss a disposition. More time will allow the defense and the government to discuss a possible disposition, without the immediate pressure of a looming plea deadline. Although some judges believe it's better to keep the pressure on, we assure the court that in this case the time is necessary if we are to achieve a disposition. The short adjournment will also ensure the continuity and effective assistance of counsel.

There are other factors which support this request. This case is of relatively recent vintage, about five months old with little time used up on the speedy trial clock. In addition, all the defendants are out on bail and compliant with their pretrial conditions of release.

Finally, one of the lawyers for one of the three defendants, William Stampur, has come down with the flu and has been unable to attend to his responsibilities on this case as of late. It is unknown when he will be back to full strength.

Accordingly, we request a brief adjournment of the trial for two weeks to allow plea negotiations to continue, with a concomitant waiver of speedy trial. The defense has a good faith basis to believe that these discussions will be productive and could very well lead to a disposition in this case, a result which is in the best interests of the parties and the court.

> SIDNEY H. STEIN U.S.D.J.

Louis M. Freeman

William Stampur

Jeffrey Pittell

cc: AUSA Rosensaft